

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

EVELYN L. MCKINLEY,	:	JURY TRIAL DEMANDED
	:	
Plaintiff,	:	Civil Action No. 04-222 E
	:	
vs.	:	
	:	
HONORABLE LES BROWNLEE,	:	Hon. Magistrate Judge
ACTING SECRETARY OF THE ARMY,	:	Susan Baxter
	:	
	:	
Defendant.	:	

**PLAINTIFF'S CONSENTED TO MOTION TO ENLARGE DISCOVERY**  
**AND ALL OTHER DEADLINES- 60 DAYS**

AND NOW, comes Plaintiff, Evelyn L. McKinley, by and through her counsel, Neal A. Sanders, Esquire, of the Law Offices of Neal A. Sanders, and files this Plaintiff's Consented to Motion to Enlarge Discovery and All Other Deadlines - 60 Days and states as follows:

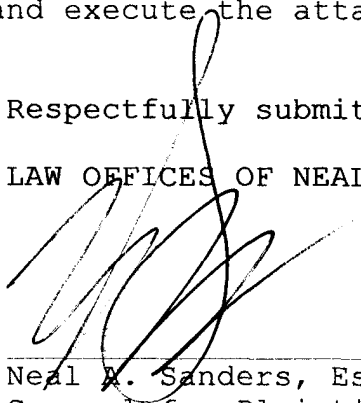
1. Discovery is set to be completed by August 1, 2005.
2. Both parties have engaged in written discovery.
3. Plaintiff has depositions to take in this wrongful termination case, consisting of: Charlie Brumbaugh, Tom Karns, Larry Flynn, Don Wetzel, Denys Smith, Beckie Miller, Arnold Fairbanks, and Dr. Garrett Dixon (Expert). There may be others.
4. Plaintiff is taking some of the depositions described in paragraph 3 on July 20, 2005.
5. Defendant is taking Plaintiff's deposition on August 4, 2005.
6. Counsels have agreed that this case can be completed with fact discovery - a sixty (60) day extension.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant Plaintiff's Consented to Motion to Enlarge Discovery and All Other Deadlines - 60 Days and execute the attached Order.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS

Dated: July 18, 2005

By:   
Neal A. Sanders, Esquire  
Counsel for Plaintiff,  
Evelyn L. McKinley

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 18<sup>th</sup> day of July, 2005, a true and correct copy of the foregoing **Plaintiff's Consented to Motion to Enlarge Discovery and All Other Deadlines - 60 Days**, was mailed by United States First Class Mail, postage prepaid, to the following:

Paul Kovac  
Assistant U.S. Attorney  
Western District of Pennsylvania  
700 Grant Street, Suite 400  
Pittsburgh, Pennsylvania 15219

*Forced*  
*7/18/05*

Dated: July 18, 2005

By: 

Neal A. Sanders, Esquire  
Counsel for Plaintiff,  
Evelyn L. McKinley

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(724) 282-7771  
PA ID No. 54618

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**NEAL A. SANDERS**

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FAX: (724) 285-6341

NEAL A. SANDERS\*  
DIRK D. BEUTH

\*Admitted also in District of Columbia

July 18, 2005

FEDERAL EXPRESS

Clerk's Office  
U.S. Post Office and Courthouse  
Room 102  
617 State Street  
Erie, Pennsylvania 16501

**RE: Evelyn L. McKinley vs. Honorable Les Brownlee, Acting**  
**Secretary of the Army**  
**Plaintiff's Consented To Motion to Enlarge Discovery and all**  
**other deadlines-60 days 04-222 E**

Dear Clerk:

Enclosed for filing please find the original and two (2) copies of the Plaintiff's Consented to Motion to Enlarge Discovery and all other Deadlines-60 Days, for the above referenced matter. Kindly date-stamp one of the copies and return to me in the enclosed self-addressed stamped envelope. Thank you.

Very truly yours,

By: 

Neal A. Sanders, Esquire

Enclosure (s)  
NAS/lmk

CC: Evelyn L. McKinley  
Paul Kovac *ESq*